

REMARKS

Initially, Applicants would like to thank the Examiner for most recently issued Official Action dated October 4, 2007. The present Amendment cancels claim 23 and adds the features of claim 23 to claim 22. Claims 14 and 15 are amended to depend from claim 22. Applicants respectfully traverse the rejection of the amended claims in view of the cited prior art.

SUMMARY OF THE OFFICE ACTION

In the above-referenced Office Action, claims 1-3 were rejected under 35 U.S.C. § 102 (e), as being anticipated by HURREN et al., U.S. Patent 6,788,681. Claim 18 was rejected under 35 U.S.C. § 103(a) as being unpatentable over HURREN et al. in view of LAMBERTON (U.S. Patent No. 6,789,121). Claims 19-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over HURREN et al. in view of LAMBERTON in view of BLANCHET et al. (U.S. Patent Application Publication No. 2004/0013130). Claims 5 and 6, 12 and 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over HURREN in view of BLANCHET et al. Claims 7-9 were rejected under 35 U.S.C. § 103(a) as being unpatentable over HURREN et al. in view of BLANCHET et al. further in view of KHALI (U.S. Patent No. 7,110,375) and further in view of Mannam (U.S. Patent Publication 2004/0105459).

The pending claims 1-3, 5-10, 12, 14, 15 and 17-22 have all been rejected as being anticipated by HURREN et al. or unpatentable at least in part over HURREN. Applicants respectfully submit that the pending claims are neither anticipated nor unpatentable in view of HURREN et al., because HURREN et al. does not disclose

certain features of the independent claims, contrary to the allegations set forth in the Official Action.

The Official Action asserts that HURREN et al. discloses various features of the independent claims. Listed below are Applicants' position regarding which features of the independent claims are not disclosed by HURREN et al.:

Claim 1

The Official Action asserts that HURREN et al. discloses the features of claim 1 relating to "determining whether a data link layer address of a destination device in the destination network is mapped to a network layer address of an egress line interface in the provider network". (See page 2 of the Official Action).

Claim 18

The Official Action asserts that HURREN et al. discloses the features of claim 18 relating to "wherein the frame is decapsulated only at the egress interface, and the egress interface forwards the frame to the destination device". (See page 4 of the Official Action).

Claim 21

The Official Action asserts that HURREN et al. discloses the features of claim 21 relating to "determining whether an address of a destination device in a destination LAN is mapped to an egress line interface" and "wherein the IPv6 packet is received at the egress line interface based on the multicast address, the LAN frame being decapsulated and transmitted to the destination LAN when the VPN identification number is verified." (See page 6 of the Official Action).

Claim 22

The Official Action asserts that the HURREN et al. discloses the features of claim 22 relating to “wherein the second interface device verifies the VPN identification number, decapsulates the LAN frame when the VPN identification number is verified, and transmits the LAN frame to the second LAN”. (See page 9 of the Official Action).

Applicants respectfully disagree with the Official Action’s characterization of HURREN et al. It is respectfully submitted that HURREN et al. does not disclose mapping an address to the “egress line interface in the provider network” (claim 1), decapsulating the frame at the “egress interface” (claim 18), decapsulating the claimed packet at the “egress line interface” (claim 21), or decapsulating the LAN frame at the “second interface device” (claim 22). Instead, HURREN et al. discloses at col. 9, lines 12-18:

This encapsulated packet is then flooded and transmitted to all members of the multicast group on the iPN 10 whether or not such a card forming part of the given inter-ring VPN is on the same ring as the sending card. Accordingly, each iPT card 24 forming part of the given VPN or TD will receive the multicast TLS/IP packet and will extract the encapsulated data frame (such as, for example, an Ethernet frame).

In other words, HURREN does not disclose decapsulating a frame at the “egress line interface” or “second interface” as claimed by Applicants, but instead discloses that a device such as iPT card 24, which is part of the local rings 22, extracts the encapsulated data frame. Accordingly, HURREN et al. does not disclose a claim feature of each of the independent claims. Accordingly, Applicants respectfully submit that Official Action does not set forth a *prima facie* case of anticipation or obviousness with respect to claims 1, 18, 21 or 22 because the cited prior art in the Official Action fails to show every

feature of the claimed invention. The Examiner, therefore, is respectfully requested to withdraw the rejections of claims 1, 18, 21 and 22 in view of the cited prior art.

Claims 2-3, 5-10, 12, 14-15, 17, 19 and 20 are each believed to be allowable at least for depending, directly or indirectly, from an allowable independent claim, as well as for additional reasons related to their own recitations.

The cancellation of claim 23, and the amendments to claims 14, 15 and 22 should not be considered an indication of Applicants' acquiescence as to the propriety of any outstanding rejection. Rather, claim 23 will have been cancelled and claim 22 will have been amended in order to advance prosecution and obtain early allowance of the claims.

In view of the herein contained amendments and remarks, Applicants respectfully request reconsideration and withdrawal of each of the objections and rejections set forth in the Office Action of October 4, 2007, together with an indication of the allowability of all pending claims, in due course. Such action is respectfully requested and is believed to be appropriate and proper.

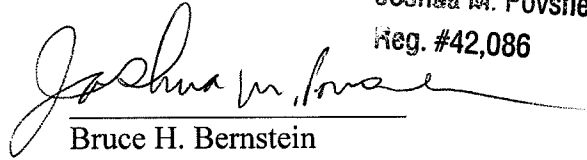
Any amendments to the claims which have been made in this amendment, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attached thereto.

Should an extension of time be necessary to maintain the pendency of this application, the Commissioner is hereby authorized to charge any additional fee to Deposit Account No. 19-0089. If the Examiner has any questions or comments regarding

this response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully Submitted,
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